



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

July 29, 1998

James Shafer, Remedial Project Manager
U S. Department of the Navy
Naval Facilities Engineering Command
Northern Division
10 Industrial Highway
Code 1823, Mail Stop 82
Lester, PA 19113-2090

Re: Navy responses to EPA comments on the Source Removal Evaluation Report for the Old Fire Fighting Training Area

Dear Mr Shafer

I am writing in response to your request for EPA to review your responses to EPA comments on the *Source Removal Evaluation Report*, dated December 1997 for the Old Fire Fighting Training Area. Many of the responses to comments focus on the objective of the source removal evaluation. The project objective for the source removal evaluation as stated in Section 1.1 of the work plan is as follows, "to determine whether site-specific conditions present at Site 09 are comparable to one or more of the eight conditions, as presented in the National Oil and Hazardous Substances Contingency Plan (40 C.F.R. §300.415), which may result in the need for a removal action to protect public health or welfare, or the environment." The objective of the field sampling plan as stated in Section 3.1 of the work plan is as follows, "to obtain adequate data to determine the need for a removal action to address discrete contaminant sources that may still be present at the Old Fire Fighting Training Area." Assessing the need for a removal action is part of both stated objectives. This assessment involves evaluating risk to human health and the environment. The *Source Removal Evaluation Report* dated January 1998 evaluates risk to human health and the environment in Section 4.5 of the report by using the eight conditions as a framework. Therefore, contrary to the Navy responses, the EPA comments related to evaluating risk are pertinent to the objective of the *Source Removal Evaluation Report* (see also EPA letter dated July 28, 1998).

The Navy has not responded to the EPA comments that were transmitted in the cover letter of our February 6, 1998 letter. These comments are therefore hereby incorporated by reference.

The following is an evaluation of the Navy responses that warrant comment in addition to the above comment regarding the objective of the report. The page numbers are from the original EPA comments and reflect the draft report.

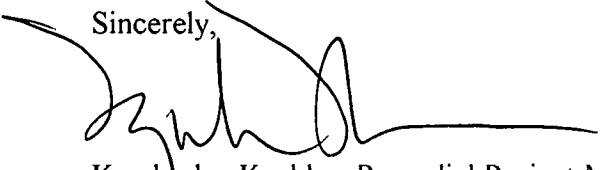
p. 3-2, §3 The EPA comment requested comparison to federal risk based standards. Risk warranting a removal action should not be assessed solely through a qualitative

comparison with RIDEM remediation regulations as is currently presented in the *Source Removal Evaluation Report*

- p 4-6, §4 4 Pages 3-7 and 3-8 of the work plan states the following "Previous analytical data from near-shore sampling detected PAHs, PCBs, and metals " "The detected PAHs were primarily combustion related (pyrogenic) and/or of creosote/coal tar origins (petrogenic) " "The objective of this subtask is to determine whether the weathered asphalt debris located at the shoreline is the source of the PAH contamination detected in the near-shore sediment samples " The sediment analytical data will be used to supplement RI sediment data and to assess the contribution to PAH analytical results be eroded asphalt along the weathered shoreline face." A comparison of new data to old data is necessary in order to determine the similarity of the pyrogenic and petrogenic PAHs and assess whether the new data indicates asphalt related PAHs

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the OFFTA We should discuss additional surface soil characterization soon. Please do not hesitate to contact me at (617) 573-5777 should you have any questions

Sincerely,



Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

- cc. Paul Kulpa, RIDEM, Providence, RI
Melissa Griffin, NETC, Newport, RI
Jennifer Stump, Gannet Fleming, Harrisburg, PA
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